



11 BROADWAY, SUITE 715
Tel. (212) 344-5180

NEW YORK, NEW YORK 10004
www.criminal-defense.nyc

MATTHEW J. GALLUZZO

ERIC M. ARNONE

MEMO ENDORSED

December 2, 2019

Judge William H. Pauley, III
Senior District Court Judge
United States District Court, Southern District of New York
VIA ECF

Re: United States v. Lazaro Rosabal Fleitas, 19-CR-631(WHP)

Dear Judge Pauley,

I represent the defendant in the above-captioned matter. I write to respectfully suggest and request an adjournment of the upcoming December 6 conference. I have conferred with my counterparts at the government and they join in this application.

Since the last adjournment, my client and I received a proposed plea agreement from the government. I think that my client and I would benefit from a bit of additional time to discuss the agreement, as well as review the discovery we have been provided. I would note that my conversations with my client are logistically challenging in that he lives in Florida, qualifies for CJA counsel, and requires the assistance of an interpreter. The parties believe that a two-week adjournment to December 20 or so would give the parties adequate time to possibly finalize their plea discussions. The defense would consent to a waiver of speedy trial time pursuant to 18 U.S.C. § 3161 for this purpose. Should the Court instead elect to reschedule this case until after the holidays, the defense would also consent to the waiver of speedy trial time.



11 BROADWAY, SUITE 715
Tel. (212) 344-5180

NEW YORK, NEW YORK 10004
www.criminal-defense.nyc

MATTHEW J. GALLUZZO

ERIC M. ARNONE

The request is also made in part because my client is CJA-eligible and a resident of Miami, Florida. As such, we have an interest in sparing him from paying for more flights to New York than necessary.

This is the second request for an adjournment that the parties have requested.

Most sincerely,

_____/s/_____
Matthew J. Galluzzo, Esq.
GALLUZZO & ARNONE LLP
11 Broadway Suite 715
New York, New York 10004
(212) 344-5180

CC:

AUSA Emily Johnson
AUSA Kiersten Fletcher
VIA EMAIL AND ECF

Application granted. Conference adjourned to December 20, 2019 at 11:30 a.m.

SO ORDERED:



WILLIAM H. PAULEY III
U.S.D.J.

December 3, 2019